33.   (New) A computerized system for comparing a left HTML file to a right HTML file, comprising:

means for detecting corresponding groups of characters in the left and right files, the detecting means including means for scanning the respective file for a groups of characters, each of which begins with a block-level HTML tag, wherein block-level HTML tag is an HTML tag that breaks flow of text when an HTML document is rendered;

means for comparing a group in the right file to a corresponding group in the left file to identify a modified group wherein some portion of the group in the left file is different from the group the right file; and

means for generating a comparison result file reflecting at least a portion of the modified group.

REMARKS

Claims 5 and 22 have been canceled; claims 1, 3, 6, 8, 12, 14, 16 and 18 have been amended; and new claims 23-33 have been added. Reconsideration of the application is respectfully requested.

Claims 1, 2, 3, 4, 6, 8, 9, 10, 12, 13, 14, 15, 16, 17, 19, 20 and 21 are rejected as being anticipated by U.S. Patent No. 5,956,726 to Aoyama et al. Claims 7 and 18 are rejected as obvious over Aoyoma et al. in view of U.S. Patent No. 5,890,171 to Blumer et al. Claims 11 and 22 are rejected as obvious over Aoyoma et al. in view of U.S. Patent No. 5,021,995 to Quint et al. The above rejections to claim 5 and 22 are now moot due to the cancellation of these claims. As will be discussed in detail below, the above rejections to claims 1-4 and 6-7 have been overcome by the amendment to claim 1; the above rejections to claims 12-21 have been overcome by the amendment to claim 12; and the above rejections to claims 8-11 are respectfully traversed.

Claims 1-4, 6-7 & new claims 23-25

The present invention relates generally to a system and method for comparing differences between two structured documents, such as HTML documents, and displaying the changed areas in the structured documents while retaining substantial formatting from the structure documents. As described in the background section of the present application, HTML language treats certain characters differently in HTML documents versus typical word-processor documents. For example, carriage returns in HTML documents are not significant; and further, a contiguous sequence of white space characters in an HTML document is equivalent to a single white space character (see Present Application, page 3).

Accordingly, claim 1 has been amended to be directed to a method for preparing a left formatted file to a right formatted file, which comprises the steps of: (a) detecting groups of characters in the left and right files; (b) *normalizing the groups in the left and right files, where the normalizing step includes the step of removing carriage returns and/or the step of converting multiple sequential white spaces into a single white space*; (c) comparing a group in the right file to a correspondence group in the left file to identify a modified group wherein some portion of the group is different between the left file and the right file; and (d) generating a comparison result file containing the modified group as section of the comparison result file to maintain the formatting of the modified groups when placed in the comparison result file. It is respectfully submitted that none of the cited prior references teach or suggest such a procedure.

Quint et al. is cited by the Office action to suggest that the step of removing carriage returns, not taught by Aoyoma et al., would have been obvious to one of ordinary skill in the art. Applicant respectfully disagrees. Quint et al. in taken from non-analogous and unrelated art.

Quint et al. is directed to a method for exchanging data between files of two different types. Whereas, the present invention and Aoyoma et al. are concerned with a method for comparing structured files of a like type. To perform the data exchange, Quint et al. must first convert the file of the first type into a generic format, and then convert the generic file to a file of the second type. The cited passage of Quint et al. (Quint et al., col. 17, lines 1-8) used by the Office action is merely describing an example of the step of converting a record file type first file into the generic file. Thus, because one of ordinary skill in the art would not have looked to Quint et al. for teachings related to a step normalizing a group of characters in a structure file for comparison with a group of characters in a like file-type, the use of Quint et al. in combination with Aoyoma et al. is misplaced.

Claims 2-4, 6-7, and new claims 23-25 depend from claim 1 as amended; and, therefore, it is respectfully submitted that these claims are allowable over the cited prior references for at least the same reasons as given above for amended claim 1.

Additionally, claim 3 has been amended to indicate that the HTML tags used for distinguishing groups in the HTML files are *block-level* HTML tags. It is respectfully submitted that none of the cited prior references teach or suggest such a step.

Specifically, as discussed in the Present Application, on page 5, lines 11-17 and on page 10, line 10 to page 11 line 17, one advantage provided by certain embodiments of the present invention is how corresponding groups of characters are identified in the left and right files for comparison. Specifically, certain embodiments of the present invention detect the groups of characters in left and right HTML files by detecting block-level HTML tags. As discussed in the Present Application and as is known to those of ordinary skill in the art, a block-level HTML tag is an HTML tag that breaks the flow of text in a HTML document when the HTML page is rendered. (See, also, http://www.w3.org/TR/REC-html32). Aoyama, et al. does not necessarily utilize block-

level HTML tags to identify corresponding groups of characters for comparison in left and right files.

Aoyama, et al., on the other hand, detects groups of characters in the left and rights files by detecting groups of characters sandwiched between "start tags" and "end tags" (see Aoyama, et al., column 1, lines 50-67). Start tags and end tags are not necessarily block-level HTML tags, nor are they always paired.

One drawback for relying upon start tags and end tags to define character groups is that it is not uncommon for HTML documents to set up groups of characters beginning with a start tag but leaving out an end tag (i.e., omitting or forgetting the end tag). It is commonplace that actual HTML documents found on the Web are not well-formed, having balanced start and end-tags. Accordingly, with these HTML documents, the Aoyama, et al. reference may fail to identify this contiguous group of characters. The exemplary embodiment of the present invention is not reliant upon rigid conformance to the HTML specification. Therefore, because Aoyama does not teach nor suggest detecting groups of characters by detecting block-level HTML tags in the HTML left and right documents, claim 3 is allowable for at least this additional reason.

Additionally, new claim 23 is distinguishable over the cited prior art because none of the cited prior art references teach or suggest that a normalizing step further includes a step of removing header tags from the files in combination with the underlying elements recited in the base claim.

Additionally, a new claim 24 is distinguishable over the cited prior art because none of the cited prior art references teach or suggest that a normalizing step further includes a step of removing script references from the files in combination with the underlying elements recited in the base claim.

Additionally, new claim 25 is distinguishable over the cited prior art because none of the cited prior art references teach or suggest that the normalizing step further includes a step of removing intra-document links from the files in combination with the underlying elements recited in the base claim.

Claims 8-11

As introduced above, the rejection to claims 8-10 are traversed. Specifically, with respect to claim 8 as originally filed, none of the prior art references teach or suggest comparing a right file to a left file on a *line-by-line* basis where *block-level* HTML elements in each file are treated as separate lines during the comparison.

First of all, as discussed above, none of the cited prior art references identify groups of characters based upon a *block-level* determination. Secondly, none of the prior art references teach or suggest the use of *line-by-line* comparison. "Line-by-line" comparison is a specific type of text comparison algorithm that is not taught nor suggested by any of the cited prior art references. Specifically Aoyama, et al. does not disclose any type of text comparison out of the algorithm at all.

Therefore, dependent claim 8 has been rewritten in independent form to include its base claim 1 and its intervening claim 5. Therefore, it is respectfully submitted that claim 8 is distinguishable from the prior art and is in condition for allowance. Claims 9-11 depend from claim 8; and, therefore, it is respectfully submitted that claims 9-11 are also allowable for at least the same reasons as given above for claim 8.

Claims 12-21 and 23-25

The amendment to claim 12 corresponds with the amendment to claim 1 as discussed above. Accordingly, it is respectfully submitted that claim 12 is distinguishable over the cited prior art references for at least the same reasons as given above for independent claim 1. Claims 13-21 and 23-25 depend from claim 12; and,

therefore, it is respectfully submitted that these claims are allowable for at least the same reasons as given above for claim 12.

Additionally, claim 14 is amended to correspond with the amendment , discussed above, with respect to claim 3. Therefore, it is also respectfully submitted that claim 14 is allowable for at least the additional reason as given above for claim 3.

Furthermore, claim 19 recites that the comparing means for comparing the right file to the left file on a *line-by-line* basis wherein each block in each file is treated as a line during the comparison. As discussed above with respect to claim 8, it is respectfully submitted that none of the cited prior art references teach or suggest use of line-by-line comparison algorithms. Therefore, it is respectfully submitted that claim 19 is also allowable for at least this additional reason.

New Claims 26-33

New claim 26 is directed to a method for comparing a left HTML file to a right HTML file that includes the steps of : (a) detecting corresponding groups of characters in the left and right files, where the detecting step includes the step of scanning the respective file for a group of characters, each of which begins with a *block-level* HTML tag, where a block-level HTML tag is an HTML tags that break the flow of text when an HTML document is rendered; (b) comparing a group in the right file to a corresponding group in the left file to identify a modified group wherein some portion of the group in the left file is different from the group in the right file; and generating a comparison result file reflecting at least a portion of the modified group. As discussed above, it is respectfully submitted that none of the prior art references teach the step of detecting groups of characters for comparison in the left and right files based upon groups of characters that begin with block-level HTML tags. Therefore, it is respectfully submitted that new claim 26 is allowable for at least this reason.

New claims 27-31 depend from new claim 26; and, therefore, it is respectfully submitted that these claims are allowable for at least the same reasons as given above for new claim 26.

Furthermore, new claim 27 recites that the method further includes the step of normalizing corresponding groups in the left and right files, where the normalizing step includes (a) a step of removing carriage returns and/or (b) a step of converting multiple sequential white spaces into a single white space, where the comparing step involves the step of comparing a normalized group in the right file to a corresponding normalized group in the left file to identify a modified group, where some portion of the normalized group in the left file is different from the normalized group in the right file. As discussed above with respect to claim 1, it is respectfully submitted that none of the prior art references teach or suggest prior art references teach or suggest such a step. Accordingly, it is respectfully submitted that new claim 27 is allowable for at least this additional reason.

Additionally, new claim 28 recites that the comparing step involves *line-by-line comparison* of the corresponding groups. As discussed above with respect to claim 8, it is respectfully submitted that none of the prior art references teach or suggest such a step in combination with the steps of the base claim; and, therefore, it is respectfully submitted that new claim 28 is allowable for at least this additional reason.

New claim 29 recites that the normalizing step includes the step of removing header tags from the files. None of the cited prior art references teach or suggest such a step in combination with the steps of the base claim; and, therefore, new claim 29 is allowable for at least this additional reason.

Additionally, new claim 30 recites that the normalizing step includes the step of removing script references from the files. None of the cited prior art references teach or

suggest such a step in combination with the steps of the base claim; and, therefore, it is respectfully submitted that new claim 30 is allowable for at least this additional reason.

Additionally, claim 31 recites that the normalizing step includes the step of removing intra-document links from the files. None of the cited prior art references teach or suggest this step in combination with the steps of the base claim; and, therefore, it is respectfully submitted that new claim 31 is allowable for at least this additional reason.
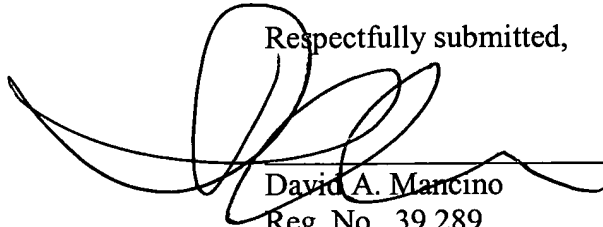
New claim 32 recites that the method further includes the step of normalizing corresponding groups in the left and right files, where the normalizing step includes (a) a step of removing carriage returns, (b) a step of converting multiple sequential white spaces into a single white space, (c) a step of removing header tags from the files, (d) a step of removing script references from the files, and/or (e) a step of removing intra-document links from the files; and where the comparing step involves a step of comparing a normalized group in the right file to a corresponding normalized group in the left file to identify a modified group where some portion of the normalized group in the left file is different from the normalized group in the right file. It is respectfully submitted that none of the cited prior art references teach or suggest such an additional step in combination with the steps of the base claim; and, therefore, it is respectfully submitted that new claim 32 is allowable for at least this additional reason.

New claim 33 is an apparatus claim substantially corresponding to the method elements in new claim 26. Accordingly, it is respectfully submitted that new claim 33 is allowable for at least the same reasons as given above for new claim 26.

In light of the foregoing, it is respectfully submitted that claims 1-4, 6-21 and 23-33, now pending, are distinguishable from the references cited, and in condition for allowance. Reconsideration and withdrawal of the objections and rejections of record is respectfully requested.

If the Examiner wishes to discuss any aspect of this response, please contact the undersigned at the telephone number provided below.

Respectfully submitted,

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